

differences between new claims 13 -17 and claims 1-12 which claims and respective rejections were addressed in the previous response. The Examiner has further indicated that applicant's arguments are considered moot in view of new grounds of rejection. It is not clear what constitutes the new grounds of rejection particularly with regard to claims 1-12 since no new art has been applied and new arguments put forth.

Applicant notes that with regard to claims 1-7 and 9-12 the arguments presented in the previous response are renewed herein. Specifically, Smith reveals that in accordance with exemplary embodiments of the invention, a hinged connector is placed **on an outside** of a case of a host computer such as a portable computer, notebook computer, or laptop. The hinged connector further includes an electrical connector to which various devices may be connected or disconnected. The connector Smith has connected to the case via a hinge allowing devices to be rotated (col. 1, lines 57-64).

In contrast, the present invention recites, *inter alia*, a personal computer, comprising a chamber capable of accepting an external device enhancing a function of the personal computer, the chamber being arranged **in** the display unit. It is respectfully submitted that the teachings of Smith do not teach a chamber capable of accepting an external device. Smith further does not teach or suggest a chamber being arranged in the display unit. Smith teaches a hinged connector 33 including an electrical connector 51, thus requiring any external devices to be connected **outside** the case of the computer. Thus, claim 1 is not anticipated by Smith.

It is respectfully submitted that claims 1-7 and 9-12 are allowable for the reasons set forth above with regard to claim 1 based upon their dependency on claim 1.

In addition, the application of Smith to new claims 13-17 is addressed as follows.

With regard to claim 13 it is alleged that Smith discloses features of claims 13 including, for example, a chamber disposed *within the display unit*, the chamber adapted to accept at least a portion of an external device within. It is important to note that, as set forth in the previous response, main display 16 unquestionably fails to include a chamber disposed within, which chamber is adapted to accept at least a portion of external device therewithin. Rather, Smith clearly shows removable media clip pad 11 which is connected by way of a hinge assembly. Media clip pad 11 is shown and described as externally attached, thus it cannot be fairly said to constitute a chamber disposed within a display. Thus a *prima facie* case of anticipation has not properly been established in that Smith fails to disclose all the claimed features as required. It is respectfully submitted therefore that rejection of claim 13 should be reconsidered and withdrawn.

The Examiner further alleges that Smith discloses the features of claim 14 including, for example, forming a chamber and a display unit such that an opening associated with the chamber is exposed to the outside of the display unit and providing an electrical connection inside the chamber such that a portion of an external device is capable of being inserted into the chamber to establish an electrical connection. Again, main display 16 of Smith is neither shown or described as having a chamber formed therein and rather, for reasons as set forth herein above, simply describes media clip pad 11 connected to the outside of a portable computer through a hinge assembly (see, e.g., Column 3 lines 61-63). Accordingly, since Smith fails to disclose all the claimed features it is respectfully submitted that a *prima facie* case of anticipation has not been properly established. It is respectfully submitted that the rejection of claim 14 should be reconsidered and withdrawn.

With regard to claim 15 the Examiner further alleges that Smith discloses the features of claim 15 including a display unit with a chamber having a predetermined depth disposed therewithin, the chamber having an electrical connection in an inner most recess thereof. For at least the reasons set forth herein above it is submitted that Smith fails to disclose a display unit with a chamber having a predetermined depth disposed therewithin. It should further be noted that Smith fails to disclose such a chamber having an electrical connection in an inner most recess thereof and, in making the rejection of claim 15, the Examiner has alleged that element 33, which is clearly described in Smith as a hinged connector, amounts to a display unit and that a recess formed in the hinged connector amounts to the claimed electrical connector in an inner most recess of a chamber. The hinged connector is shown, for example, in figure 7 of Smith. We respectfully disagree with the characterization of hinged connector 33 and submit that the description accompanying Figure 7 confirms that a display unit is not described as asserted by the Examiner (see, e.g., Column 5, line 59). Accordingly, it is respectfully submitted that, since all the elements are not disclosed in Smith, a *prima facie* case of anticipation has not properly been established. It is respectfully submitted therefore that the rejection of claim 15 should be reconsidered and withdrawn.

With regard to claim 16, the Examiner alleges that Smith discloses features thereof including, for example, a chamber formed inside a display unit, the chamber having walls capable of covering the bottom side, the left side and the right side and a front and back sided of an external device the chamber having an opening disposed on the outside of the display unit for inserting the external device. In supporting this grounds of rejection, hinged connector 33 is again alleged to amount to the claimed display unit with the claimed chamber. For at least the reasons set forth hereinabove,

we believe that equating hinged connector 33 with the claimed display and chamber is a tenuous characterization of Smith and submit that hinged connector 33 can simply not amount to, for example, the claimed display unit with the claimed chamber since it is disposed on the outside of main display 16. Since all the elements are not disclosed in Smith as required it is submitted that a *prima facie* case of anticipation has not been properly established. Accordingly, it is submitted that the rejection of claim 16 should be reconsidered and withdrawn.

With regard to claim 17 the Examiner alleges that Smith discloses a method of claim 17 including, for example, forming a chamber inside a display unit, the chamber having walls covering bottom side, right side, left side and a front and back side of an external device and a forming an opening associated with the chamber such that only the opening of the chamber is disposed on the outside of the display unit. It is respectfully submitted that in making the rejection of claim 17 and claim 14 the Examiner has not properly alleged that Smith discloses the above claimed features. In addition, it is respectfully submitted that Smith fails to disclose the above claimed features.

It is important to note that, again, in regard to all of the above grounds for rejection, Smith simply fails to disclose a chamber or opening *in or inside* a display unit as respectively recited in the various claims. At best, Smith describes that a hinged connector is disposed on or outside a display (Column 1 line 57). Thus it can not fairly be said that Smith anticipates the claimed invention which includes the feature of, for example, a chamber disposed within a display unit, and the like. Accordingly, it is respectfully submitted that a *prima facie* case of anticipation has not properly been

established with regard to claims 14 and 17. It is respectfully submitted therefore that the rejection of claim 14 and 17 be reconsidered and withdrawn.

It appears that, at best, with regard to all of the grounds for rejection, Smith is being applied in a piecemeal fashion, e.g. no single unit of Smith identically discloses the claimed invention and thus a proper *prima facie* case of anticipation can not be established (See, *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984)(citing *Connell v. Sears Roebuck Co.*, 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983)). Further, in applying Smith in a piecemeal fashion, it follows, almost by necessity, that the Examiner has used improper hindsight in applying the teachings of the present application to pick and choose sections of Smith which appear to contain anticipatory disclosure but, when viewed as against the claimed invention as a whole, are found deficient for at least the reasons set forth hereinabove. It was further established in *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1250 (Fed.Cir. 1989), 9 U.S.P.Q.2d (BNA) 1913 (Fed. Cir. 1989) , that "hindsight" is not anticipation and that the law of anticipation requires that the same invention, with all the limitations of the claims, exist in the prior art.

CONCLUSION

It is respectfully submitted that the application is now in condition for allowance and a Notice of Allowance is earnestly solicited. Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Robert L. Scott, II (Reg. No. 43,102) at the telephone number of (703) 205-8000, to conduct an interview in an effort to expedite prosecution in connection with the present application.

Applicant respectfully petitions for a one (1) month extension of time pursuant to 37 C.F.R. §§ 1.17 and 1.136(a). A check in the amount of \$110.00 for payment of the extension fee is attached hereto.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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